

May 26, 2022

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMIUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
22-20224-CR-BLOOM/OTAZO-REYES
CASE NO.

18 U.S.C. § 1591(a)(1) and (b)(1)
18 U.S.C. § 1594(a)
18 U.S.C. § 2422(b)
18 U.S.C. § 2428
18 U.S.C. § 1594

UNITED STATES OF AMERICA

vs.

ALAN LI,
a/k/a "Michael Chen,"

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1
Attempted Sex Trafficking of a Minor
(18 U.S.C. §§ 1591(a)(1) and (b)(1), and 1594(a))

From on or about March 12, 2022, and continuing through on or about May 12, 2022, in Miami-Dade County, in the Southern District of Florida, the defendant,

ALAN LI,
a/k/a "Michael Chen,"

did knowingly attempt to recruit, entice, obtain, patronize, and solicit by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, said conduct in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1594(a).

Pursuant to Title 18, United States Code, Section 1591(b)(1), it is further alleged that this offense involved a person who had not attained the age of 14 years at the time of such offense.

COUNT 2

**Attempted Coercion and Enticement of a Minor to Engage in Sexual Activity
(18 U.S.C. § 2422(b))**

From on or about March 12, 2022, and continuing through on or about May 12, 2022, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ALAN LI,
a/k/a "Michael Chen,"**

using a facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(b).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **ALAN LI, a/k/a "Michael Chen,"** has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Sections 1591 and/or 1594, as alleged in this Indictment, the defendant shall forfeit to the United States: (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property, pursuant to Title 18, United States Code, Section 1594(d)(1); and (b) any property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation, or any property traceable to such property, pursuant to Title 18, United States Code, Section 1594(d)(2).

3. Upon conviction of a violation of Title 18, United States Code, Section 2422, as alleged in this Indictment, the defendant shall forfeit to the United States: (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and (b) any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 2428.

All pursuant to Title 18, United States Code, Sections 1594 and 2428, and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

JAG
Fwd JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

KWG
KATHERINE W. GUTHRIE
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.:

V.

Alan Li,
a/k/a "Michael Chen,"

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Court Division (select one)

Miami Key West FTP
 FTL WPB

New Defendant(s) (Yes or No)

Number of New Defendants

Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) **No**
List language and/or dialect:
4. This case will take **4** days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I 0 to 5 days Petty
II 6 to 10 days Minor
III 11 to 20 days Misdemeanor
IV 21 to 60 days Felony
V 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) **NO**
If yes, Judge Case No.
7. Has a complaint been filed in this matter? (Yes or No) **YES**
If yes, Magistrate Case No. **22-MJ-02806-LFL**
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) **NO**
If yes, Judge Case No.
9. Defendant(s) in federal custody as of **May 12, 2022**
10. Defendant(s) in state custody as of
11. Rule 20 from the **District of**
12. Is this a potential death penalty case? (Yes or No) **NO**
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) **NO**
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) **NO**

By:

~~Katherine W. Guthrie~~

Assistant United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ALAN LI a/k/a "Michael Chen"

Case No: _____

Count #: 1

Attempted Sex Trafficking of a Minor

Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and 1594(a)

*Min./Max. Penalty: Minimum of 15 Years' Imprisonment, Maximum of Life Imprisonment

Count #: 2

Attempted Coercion and Enticement of a Minor to Engage in Sexual Activity

Title 18, United States Code, Section 2422(b)

* Min./Max. Penalty: Minimum of 10 Years' Imprisonment, Maximum of Life Imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**